

EXHIBIT 1

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

SIA HENRY, et al.,

Plaintiffs,

vs.

BROWN UNIVERSITY, et al.,

Defendants.

) Docket No. 22 C 125

) Chicago, Illinois
) January 23, 2024
) 10:30 o'clock a.m.

TRANSCRIPT OF PROCEEDINGS
BEFORE THE HONORABLE MATTHEW F. KENNELLY

APPEARANCES:

For the Plaintiffs: GILBERT LITIGATORS & COUNSELORS
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1 donation, the donor's name, the date of the donation, the
2 student's name, the year the student was admitted, the most
3 efficient way to have direct evidence is to take those names
4 in a very targeted way and put them into the admissions and --
5 rather, into the development and president's office.

6 That's -- very narrow dispute.

7 THE COURT: Time out. Let me tell you what I heard
8 from that and then you will tell me if I got it wrong.

9 Again, my question was, why are the UIDs not enough,
10 why do you need to have the names? The answer, my take-away
11 from what you said is that we're going to take the names and
12 then go to get more information from the president and
13 development office that we don't currently have and it will be
14 easier to do that if we have the names.

15 That's what I heard. Did I hear it right?

16 MR. GILBERT: Very close to right, your Honor. It is
17 more efficient -- they have -- they're creating the haystack
18 that you're describing. They want --

19 THE COURT: Why can't you go -- why can't you go into
20 the president's office and say, give us the data on person
21 123456 from the president's office and the development office?

22 MR. GILBERT: Because we don't have -- again, what
23 they're doing is creating lists of UIDs that are
24 indecipherable and then we have to compare them to other
25 information they give us which is indecipherable that has all

1 kinds of redactions in it, and in order to avoid that and be
2 more efficient and allow us to get the most direct evidence,
3 just use the names that are completely protected.

4 And we are fine with the point that your Honor has
5 raised about an enhanced AEO, that's fine with us.

6 I would also point out --

7 THE COURT: Wait a second. Basically is what we're
8 talking about here is that in order for -- in order for you to
9 be able to really, you know, put this all together, you're
10 going to need to get something else beyond what's at issue on
11 the current motion that I haven't yet given you access to?
12 Yes or no?

13 MR. GILBERT: The current motion --

14 THE COURT: Stop. That is a yes-or-no question. If
15 you don't answer yes or no, you are finished for today.

16 MR. GILBERT: No. The current motion calls for
17 documents and communications in the president's office and the
18 development office on these individuals who we've identified.

19 THE COURT: Okay. Thanks. The motion's taken under
20 advisement. Take care. Bye.

21 (Which were all the proceedings had in the above-entitled
22 cause on the day and date aforesaid.)

23 I certify that the foregoing is a correct transcript from
24 the record of proceedings in the above-entitled matter.

25 /s/ Carolyn R. Cox, CSR, RPR, F/CRR January 24, 2024
Official Court Reporter
United States District Court
Northern District of Illinois
Eastern Division